



Qwest
1020 Nineteenth Street NW, Suite 700
Washington, DC 20036
Phone 202.429.3120
Facsimile 202.293.0561

Melissa E. Newman
Vice President-Federal Regulatory

May 16A, 2003

EX PARTE

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 03-90 - Application by Qwest Communications International Inc. for Authority to Provide In-Region InterLATA Services in the State of Minnesota

Dear Ms. Dortch:

At the request of Commission staff, Qwest Communications International Inc. ("Qwest") hereby submits an update concerning the customized branding requested by WorldCom. As of Friday, May 9, 2003, this customized branding is being provided on WorldCom's UNE-P end-users' calls to Qwest's operator services and directory assistance service. WorldCom's trouble tickets have been successfully closed.

By way of background, in October, 2002, WorldCom completed a customer questionnaire wherein it requested customized branding on its UNE-P end users' calls to Qwest's operator services and directory assistance service. The due date on the branding request was January 1, 2003. The questionnaire requires the CLEC to provide its Operating Company Number (OCN) [also referred to as Service Provider Identification (SPID)]. Qwest requires the use of national OCNs for reseller and UNE-P CLECs, and the use of state-specific OCNs for facilities-based CLECs (excluding UNE-P), as this is consistent with the standards that NECA uses when it assigns OCNs to CLECs. On its questionnaire, WorldCom provided its state-specific OCN (for facilities-based use, excluding UNE-P) rather than its national OCN (for resale and UNE-P use).

When Qwest received WorldCom's branding request, Qwest processed it, establishing a WorldCom customized brand message by January 1, 2003, and associating the brand message with the OCN provided by WorldCom. However, the OCN associated with WorldCom's Minnesota UNE-P lines is WorldCom's national OCN, which is used for resale and UNE-P. For each resale, UNE-P, and Qwest retail end-users' call to Qwest's directory assistance and operator services platforms, a query is made to Qwest's Line Information Database (LIDB) in order to identify the local service provider that is associated with each end-user calling number and in order to play the proper brand messages. Since the OCN associated with the WorldCom

customized brand message and the OCN associated with WorldCom's UNE-P lines did not match, the WorldCom customized brand message did not play. Qwest was not aware of this problem until WorldCom placed trouble tickets with Qwest on or about May 1, 2003. WorldCom also brought this problem to the attention of its Qwest service managers at about the same time that it placed the trouble tickets.

In response to this problem identified by WorldCom's branding request and its trouble tickets, Qwest has taken the following steps:

- First, as of Friday, May 9, 2003, Qwest corrected the branding for WorldCom's UNE-P lines by associating WorldCom's national OCN with its customized brand message so that there is alignment between the message and the OCN information in LIDB for WorldCom's UNE-P lines. On May 12, WorldCom confirmed that this repair effort was successful.
- Second, Qwest is modifying its documentation for CLECs pursuant to a Change Management Process (CMP) Notification. This notice will advise CLECs that Qwest requires the CLEC to provide a national OCN, assigned by NECA, for resale and UNE-P CLECs' branding requests, and requires a state-specific OCN, also assigned by NECA, for facilities-based CLECs' branding requests. The notice will advise that Qwest's Directory Assistance and Operator Services product catalogs (PCATs) for CLECs have been updated to describe these requirements. In addition, the customer questionnaire has been modified to indicate which type of OCN is to be provided by the CLEC when requesting branding. Qwest has modified its internal procedures for handling of branding requests so that it will verify that the OCN contained in the LIDB is consistent with the OCN provided by the CLEC.
- Third, if Qwest detects customer questionnaires with incorrect or incomplete OCNs, Qwest will notify the CLEC.
- Fourth, Qwest will provide additional training to its repair center and interconnection service center personnel to reconfirm for them that Qwest provides CLEC customized branding for Qwest's operator services and directory assistance service accessed via resold and UNE-P lines, and that they should refer a CLEC to its Qwest service manager if the CLEC has questions about branding.
- Finally, Qwest points out that it has successfully provided customized and/or generic branding to other CLECs in Minnesota, including 29 reseller CLECs, UNE-P CLECs, and/or other facilities-based CLECs. Qwest has provided customized or generic branding to 90 reseller, UNE-P, and/or other facilities-based CLECs in its 14 states. Qwest believes that the situation with WorldCom's branding request will not recur given the steps described above.

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

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Respectfully submitted,

/s/

Melissa Newman

cc: G. Cohen
J. Myles
G. Remondino
R. Harsch
B. Harr